

ROPES & GRAY LLP
Gregg M. Galardi
Jonathan P. Gill
Kristina K. Alexander
Stacy A. Dasaro
1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: (212) 596-9000
Facsimile: (212) 596-9090

*Proposed Counsel to the Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : Chapter 11
Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)
Debtors. : (Joint Administration Requested)
-----X

AGENDA FOR FIRST DAY HEARING

Date and Time: June 15, 2016 at 11:00 a.m. (Prevailing Eastern Time)

Location of Hearing: The Honorable Judge Stuart M. Bernstein
United States Bankruptcy Court for the Southern District of New York
Alexander Hamilton Custom House
One Bowling Green, Courtroom No. 723
New York, New York 10004

Copies of Motions: A copy of each pleading can be viewed on the Court's website at www.nysb.uscourts.gov and the website of the Debtors' proposed notice and claims agent, Prime Clerk LLC, at <https://cases.primeclerk.com/gawker>. Further information may be obtained by calling Prime Clerk toll free at 866-692-6696 or internationally at 929-342-0759.

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). The offices of Gawker Media LLC and Gawker Media Group, Inc. are located at 114 Fifth Avenue, 2d Floor, New York, NY 10011. Kinja Kft.'s offices are located at Andrássy út 66. 1062 Budapest, Hungary.

I. Introduction

1. ***First Day Declaration.*** Declaration of William D. Holden in Support of First Day Motions [Docket No. 7].

II. Matters Requested to Be Heard at First Day Hearing

2. ***1007 Waiver Motion.*** Debtor's Motion for an Order (I) Granting a Waiver of the Requirements of Local Rule 1007-2(a), (b), and (c), and (II) Granting an Extension of Time to File Lists Required by Bankruptcy Rule 1007 [Docket No. 2].
3. ***Joint Administration Motion.*** Debtors' Motion for Joint Administration [Docket No. 8].
4. ***Consolidated Creditors List.*** Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Prepare a List of Creditors in Lieu of Submitting a Formatted Mailing Matrix and (B) File a Consolidated List of the Debtors 50 Largest Unsecured Creditors and (II) Approving the Form and Manner of Notifying Creditors of Commencement of These Chapter 11 Cases [Docket No. 9].
5. ***Schedules Extension Motion.*** Debtors' Motion for Entry of an Order Extending Deadline for Debtors to File Their Schedules of Assets and Liabilities and Statements of Financial Affairs [Docket No. 10].
6. ***Case Management Motion.*** Debtors' Motion for Entry of an Order Establishing Certain Notice, Case Management, and Administrative Procedures and Omnibus Hearing Dates [Docket No. 11].
7. ***Cash Management Motion.*** Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to Continue Using the Debtors Bank Accounts, Business Forms, and Cash Management System, and Granting Related Relief [Docket No. 12].
8. ***Wages Motion.*** Debtors' Motion for Entry Interim and Final Orders (I) Authorizing, but not Directing, Payment Of Prepetition Wages, Salaries, Business Expenses, Employee Benefits and Related Items, and (II) Directing All Financial Institutions to Honor Checks for Payment of Such Obligations [Docket No. 13].
9. ***Taxes Motion.*** Debtors' Motion for Entry of Interim and Final Orders Authorizing Payment of Income Taxes, Property Taxes, Sales and Use Taxes and Hungarian Taxes [Docket No. 14].
10. ***Critical Vendors Motion.*** Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors and Foreign Vendors [Docket No. 15].
11. ***Insurance Motion.*** Debtors' Motion for Entry of Interim and Final Orders Authorizing, but not Directing, The Debtors to (A) Continue Insurance Coverage Entered Into Prepetition, (B) Renew or Purchase New Insurance Policies in the

Ordinary Course of Business, and (C) Pay all Prepetition Obligations Relating Thereto [Docket No. 16].

12. ***Utilities Motion.*** Debtors' Motion for Entry of an Order (A) Prohibiting Utility Companies from Discontinuing, Altering, or Refusing Service, (B) Deeming Utility Companies to have Adequate Assurance of Payment, And (C) Establishing Procedures for Resolving Requests for Additional Assurance [Docket No. 17].

13. ***DIP Motion.*** Debtors Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 and 364 and Rules 2002, 4001, and 9014 of the Federal Rules of Bankruptcy Procedure (I) Authorizing Incurrence by the Debtors of Postpetition Secured Indebtedness, (II) Granting Liens, (III) Authorizing Use of Cash Collateral by the Debtors and Providing for Adequate Protection, (IV) Modifying the Automatic Stay, and (V) Scheduling a Final Hearing [Docket No. 19].

a. ***Holden Declaration.*** Declaration of William D. Holden in Support of DIP Financing Motion. [Docket No. 20].

Dated: June 14, 2016
New York, New York

/s/ Gregg M. Galardi
ROPES & GRAY LLP
Gregg M. Galardi
Jonathan P. Gill
Kristina K. Alexander
Stacy A. Dasaro
1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
gregg.galardi@ropesgray.com
jonathan.gill@ropesgray.com
kristina.alexander@ropesgray.com
stacy.dasaro@ropesgray.com

*Proposed Counsel to the Debtors
and Debtors in Possession*